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15 Lead Counsel for Plaintiffs

16 [Additional counsel appear on signature page.]

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19 SAN JOSE DIVISION

20 In re JUNIPER DERIVATIVE ACTIONS) No. 5:06-cv-03396-JW

21 _____)
22 This Document Relates To:) STIPULATION AND ~~[PROPOSED]~~ ORDER
23 ALL ACTIONS.) REGARDING FILING OF
24 _____) CONSOLIDATED COMPLAINT

1 This Stipulation is entered into by and among plaintiffs and nominal defendant Juniper
2 Networks, Inc. ("Juniper") and defendants Scott G. Kriens, Stratton D. Sclavos, William R.
3 Stensrud, Robert M. Calderoni, Kenneth A. Goldman, William R. Hearst III, Kenneth Levy, Frank J.
4 Marshall, Robert R.B. Dykes, Pradeep Sindhu, James A. Dolce, Jr., Marcel L. Gani, Steven R. Haley
5 and Peter L. Wexler, through their attorneys of record.

6 WHEREAS, on October 20, 2006, the Court ordered that plaintiffs shall file a Consolidated
7 Complaint by January 12, 2007; and

8 WHEREAS, on December 20, 2006, Juniper announced that it will need to restate its
9 historical financial statements to record additional non cash charges for stock-based compensation;
10 and

11 WHEREAS, defendants do not object to an extension of time for plaintiffs to file their
12 Consolidated Complaint three weeks after Juniper files its restated financial statements with the
13 Securities and Exchange Commission, or February 23, 2007, whichever occurs first.

14 THEREFORE, the undersigned parties stipulate as follows:

15 1. Plaintiffs shall file and serve the Consolidated Complaint within three weeks after
16 Juniper files its restated financial statements with the Securities Exchange Commission, or
17 February 23, 2007, which ever occurs first;

18 2. Defendants shall file and serve their response to the Consolidated Complaint 60 days
19 after service of the Consolidated Complaint;

20 3. Plaintiffs shall file and serve their opposition to defendants' motion to dismiss 60
21 days after service of the motion to dismiss; and

22 4. Defendants shall file and serve their reply 21 days after service of the opposition.

23 IT IS SO STIPULATED.

24 DATED: January 11, 2007

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27 s/ Travis E. Downs III
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Additional Counsel for Plaintiffs

1 *I, Travis E. Downs III, am the ECF user whose ID and password are being used to file*
2 *this Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint. In*
3 *compliance with General Order 45, X.B., I hereby attest that Steven Guggenheim has concurred*
4 *in this filing.*

5 DATED: January 11, 2007

6
7 WILSON SONSINI GOODRICH
8 & ROSATI, P.C.
9 NINA F. LOCKER
10 STEVEN GUGGENHEIM

11 s/ Steven Guggenheim
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17 Attorneys for Defendants

18 * * *

19 **ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: January 12, 2007

22 
23 THE HONORABLE JAMES WARE
24 UNITED STATES DISTRICT JUDGE

25 S:\CasesSD\Juniper Networks Derivative\S_O00038084.doc

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Travis E. Downs III
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Manual Notice List

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